

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: :  
 :  
ERIK E. ROTH : Case No. 19 - 10232 TPA  
 :  
DEANA R. ROTH : CHAPTER 13  
 :  
 : Docket No.  
Debtors. :  
----- :  
UNION HOME MORTGAGE CORP. :  
Movant, :  
 :  
v :  
 :  
ERIK E. ROTH, DEANA R. R. ROTH: :  
and :  
RONDA J. WINNECOUR, ESQUIRE, :  
TRUSTEE :  
Respondents. :

**DEBTORS' DECLARATION**

Dated: 09/27/2019

Attorney for the Debtors:

ACHILLE LAW, P.C.

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**DEBTORS' DECLARATION**

We, upon our oath according to law, hereby certify that the existing Chapter 13 Plan dated September 16, 2019, is sufficient to fund the Plan with the modified debt (Notice of Mortgage Postpetition Mortgage Fees, Expenses and Charges - Claim #5) as the Debtors' Plan is sufficient to fund the postpetition fees, expenses and charges.

Dated: September 27, 2019

By: s/Erik E. Roth  
Erik E. Roth, Debtor

Dated: September 27, 2019

By: s/Deana R. Roth  
Deana R. Roth, Debtor

Dated: September 27, 2019

By: s/Joseph H. Ellermeyer  
Joseph H. Ellermeyer  
Attorney for Debtors